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To: ERD/OERR (EPA5511)
To: JACK.OWENS (EPA93012)
To: G.CRYSTALL (EPA93028)
To: K.WOLPER (EPA93029)
To: J.VINISKI (EPA9314)
To: REGION03.TAT (EPA9322)
To: C.KLEEMAN (EPA9340)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Mon 20-May-91 14:47 EDT
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Subject: BAHN WAREHOUSE/STRAWBERRY ALLEY SITE POLREP #22
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POLREP #22

BAHN WAREHOUSE/STRAWBERRY ALLEY SITE
CERCLA ENFORCEMENT SECTION

MECHANICSBURG, CUMBERLAND COUNTY, PA

ATTN: DENNIS CARNEY AND KAREN WOLPER

I. SITUATION (1900 HOURS, FRIDAY, MAY 3, 1991)

A. BACKGROUND:

THE CERCLA REMOVAL ENFORCEMENT SECTION (CRES) OF EPA REGION III, IN ACCORDANCE WITH APPLICABLE LAWS AND REGULATIONS, ISSUED AN ADMINISTRATIVE ORDER REQUIRING THAT THE RESPONDENT PRP COMBUSTION ENGINEERING (CE) PREPARE, SUBMIT AND IMPLEMENT A WORK PLAN FOR REMOVAL RESPONSE ACTIONS TO MITIGATE THE THREATS POSED BY MATERIALS ONSITE TO PUBLIC HEALTH OR WELFARE AS THEY RELATE TO THE CRITERIA SET FORTH IN THE NCP.

THIS WORK PLAN WAS REQUIRED TO ADDRESS AT LEAST THE FOLLOWING: SITE HEALTH & SAFETY, SITE SECURITY, DRUM HANDLING AND DISPOSAL, FLOOR DECON, GENERATOR ID, AND IMPLEMENTATION SCHEDULE.

CE NOTIFIED EPA THAT IT HAD SELECTED ABB ENVIRONMENTAL SERVICES, INC. (ABB) TO SERVE AS ITS QUALIFIED CONTRACTOR IN IMPLEMENTING ANY AND ALL ACTIVITIES ONSITE.

B. CRES OSC STEUTEVILLE WAS NOTIFIED BY ABB PROJECT MANAGER (PM) CAMPBELL THAT ABB WAS IN A POSITION TO IMPLEMENT THE SITE WORK PLAN THE WEEK OF MONDAY, APRIL 29, 1991.

C. PERSONNEL ON SCENE:

5/01/91: EPA - 1, PADER - 1, TAT - 1, ABB - 5, PRP - 2

5/02/91: TAT - 1, ABB - 5, PRP - 1

5/03/91: TAT - 1, ABB - 3, PRP - 1

D. WEATHER:

WARM, SUNNY AND CLEAR, TEMPERATURES IN THE 70'S & 80'S.

II. ACTIONS TAKEN

A. OSC AND TAT MOBILIZED TO THE SITE TO WITNESS PRP REP ONSITE ACTIVITIES IN COMPLIANCE WITH ADMINISTRATIVE ORDER FOR REMOVAL RESPONSE ACTIVITIES REGARDING THE DISPOSAL OF PRP PRODUCT OR WASTE PRODUCT DRUMS LOCATED AT THE BAHN WAREHOUSE/STRAWBERRY ALLEY SITE FACILITY.

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- B. ABB PERSONNEL MOBILIZED TO THE SITE TO IMPLEMENT THE APPROVED WORK PLAN FOR THE SITE.
- C. OSC STEUTEVILLE COORDINATED ALL PRP REMOVAL RESPONSE ACTIVITIES WITH PADER, LOCAL OFFICIALS AND PROPERTY OWNER.
- D. PADER LYLE OF THE PADER EMERGENCY RESPONSE SECTION, WAS ONSITE TO VIEW SITE REMOVAL ACTIVITIES TO DATE.
- E. ABB SPOT CHECKED DRUMS USING PREVIOUS ANALYTICAL DATA TO FACILITATE FINALIZING TRANSPORTATION AND DISPOSAL ARRANGEMENTS FOR THE SITE WASTE MATERIALS TO BE ADDRESSED UNDER THIS ORDER.
- F. ABB PM CAMPBELL AND ONE PERSON FROM HIS SUBCONTRACTOR (WEAVERTOWN ENVIRONMENTAL GROUP) TRANSPORTED SEVERAL SAMPLES TO A LOCAL LABORATORY TO CLEAR UP ANY DISCREPANCIES IN ID OF MATERIALS USING ANALYTICAL SPOT CHECKS.
- G. ABB SEGREGATED ALL DRUMS INTO PRODUCT GROUPINGS FOR LABELLING AND SUBSEQUENT TRANSPORTATION AND DISPOSAL.
- H. DRUMS THAT WERE DEEMED UNSHIPABLE PER DOT REGULATIONS WERE EITHER OVERPACKED OR THEIR RESPECTIVE CONTENTS TRANSFERRED TO A DOT SHIPPABLE CONTAINER.
- I. OSC STEUTEVILLE MET WITH ONE OF THE PRP BAHN BROTHERS REGARDING THE SUCCESSFUL COMPLETION OF RESPONSE ACTIVITIES UNDER THIS ORDER.
- J. ABB SHIPPED 152 DRUMS (TWO TRUCK LOADS) OF WASTE MATERIALS TO AN OFFSITE PETROCHEMICAL PROCESSING FACILITY FOR PRODUCT RECOVERY VIA BLENDING.
- K. THE FLOOR WAS SWEEPED, SCRAPPED AND DOUBLE WASHED IN ACCORDANCE WITH THE ORDER TO CLEAN THE FLOOR OF THE WAREHOUSE.
- L. PALLETS WERE GATHERED AND SHIPPED OFFSITE TO A LOCAL TRUCKING COMPANY FOR SHREDDING.
- M. KEYS WERE RETURNED TO PRP BAHN. TAT PHOTODOCUMENTED THE EVENTS OF THE THREE DAYS OF ADMINISTRATIVE ORDER COMPLIANCE. TAT AND ABB PERSONNEL DEMOED FROM THE SITE THIS DATE.

III. FUTURE PLANS

- A. ABB TO SECURE AND PROVIDE TO THE OSC CERTIFICATES OF DESTRUCTION FROM EACH DISPOSAL FACILITY FOR EACH WASTE STREAM SHIPPED OFFSITE FOR DISPOSAL.
- B. ALL ONSITE ACTIVITIES PROPOSED AND SCOPED IN THE SCOPE OF WORK FOR THIS ADMINISTRATIVE ORDER HAVE BEEN COMPLETED, EXCEPT FOR SEALING THE CONCRETE FLOOR. ALL PERSONNEL DEMOBILIZED FROM THE SITE ON FRIDAY, MAY 3, 1991. CRES OSC STEUTEVILLE HAS DETERMINED THAT NO FURTHER ONSITE PRP ACTION IS DEEMED NECESSARY

AT THE BAHN WAREHOUSE/STRAWBERRY ALLEY SITE AT THIS TIME, EXCEPT FOR SEALING THE FLOOR. OSC AWAITING FINAL CERTIFICATES OF DISPOSAL.

BILL STEUTEVILLE, OSC
US EPA REGION III
PHILADELPHIA, PA

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